Ohio Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

3/7/2016

Certified Mail

No	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Mr. Mike Yoder
ProVia Walnut Creek Facility
2150 State Route 39
Sugarcreek, OH 44681

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0238000159
Permit Number: P0120249
Permit Type: Initial Installation
County: Holmes

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Holmes County Hub. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted.Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now.If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)963-1200.

Sincerely,

Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

Cc: U.S. EPA Region 5 -*Via E-Mail Notification*
Ohio EPA-NEDO

Permit Strategy Write-Up

1. Check all that apply:

   Synthetic Minor Determination

   Netting Determination

2. Source Description:

   ProVia Walnut Creek Facility is a door manufacturing facility with woodworking operations and spray booths. PTI P0120249 is an initial installation permit for 3 spray booths with natural gas ovens – R014, R015 and R016.

3. Facility Emissions and Attainment Status:

   The facility is a Title V facility for VOCs (this permit will put facility-wide PTE at 229 TPY), and it is located in Holmes County, which is in attainment for all criteria pollutants.

4. Source Emissions:

   R014, R015 and R016 will add 61.91 TPY of VOC, putting facility-wide VOC PTE at 229 TPY.

5. Conclusion:

   The facility is a major source of VOC, and will be submitting a revised Title V PTO application to include R014, R015 and R016. VOC PTE will be under 250 TPY (229 TPY) and avoid the requirements of PSD.

6. Please provide additional notes or comments as necessary:

   None.

7. Total Permit Allowable Emissions Summary (for informational purposes only):

Pollutant	Tons Per Year
VOC	61.91

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at:http://epa.ohio.gov/actions.aspx or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email:HClerk@epa.ohio.gov

Draft Air Pollution Permit-to-Install Initial Installation
ProVia Walnut Creek Facility
2150 State Route 39,,Sugarcreek, OH 44681
ID#:P0120249
Date of Action: 3/7/2016
Permit Desc:Initial PTI application for new installations of a primer spray booth and two (2) top coat spray booths..
The permit and complete instructions for requesting information or submitting comments may be obtained at: http://epa.ohio.gov/dapc/permitsonline.aspx by entering the ID # or: Andrew Marantides, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)963-1200

DRAFT

Division of Air Pollution Control
Permit-to-Install
for
ProVia Walnut Creek Facility

Facility ID:	0238000159
Permit Number:	P0120249
Permit Type:	Initial Installation
Issued:	3/7/2016
Effective:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install
for
ProVia Walnut Creek Facility

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Authorization

Facility ID:	0238000159
Facility Description:	Door manufacturing facility
Application Number(s):	A0055163
Permit Number:	P0120249
Permit Description:	Initial PTI application for new installations of a primer spray booth and two (2) top coat spray booths.
Permit Type:	Initial Installation
Permit Fee:	$600.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date:	3/7/2016
Effective Date:	To be entered upon final issuance

This document constitutes issuance to:

ProVia Walnut Creek Facility
2150 State Route 39
Sugarcreek, OH 44681

of a Permit-to-Install for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)963-1200

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0120249
Permit Description: Initial PTI application for new installations of a primer spray booth and two (2) top coat spray booths.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Group Name: Spray Booths w/Natural Gas Ovens

Emissions Unit ID:	**R014**
Company Equipment ID:	New 2016 Primer Booth
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**R015**
Company Equipment ID:	Auto 2016 Top Coat 1
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**R016**
Company Equipment ID:	Auto 2016 Top Coat 2
Superseded Permit Number:	
General Permit Category andType:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A.2.a), Severability Clause

(2) Standard Term and Condition A.3.c) through A. 3.e)General Requirements

(3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A.9., Reporting Requirements

(5) Standard Term and Condition A.10., Applicability

(6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A.14., Public Disclosure

(8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A.16., Fees

(10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.

(2) Quarterly written reports of (i) any deviations from federally enforceable emissionlimitations, operationalrestrictions, andcontroldeviceoperatingparameterlimitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northeast District Office. The written reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, andreportingrequirements contained in this permit shall be submitted to the Ohio EPA DAPC, Northeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to theOhio EPA DAPC, Northeast District Officein accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

a) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the appropriate Ohio EPA District Office or contracted

local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the Ohio EPA DAPC, Northeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to theOhio EPA DAPC, Northeast District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s)not exempt from the requirement to obtain a Permit-to-Install.

11. Construction of New Sources(s) and Authorization to Install

a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the

Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted,no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d)must be <u>obtained before</u>operating the source in a manner that would violate the existing Title V permit requirements.

13. Construction Compliance Certification

The applicant shall identify the following dates in the "Air Services"facility profile for each new emissions unit identified in this permit.

a) Completion of initial installation date shall be enteredupon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed.The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

2. The Ohio EPA has determined that this facility may be subject to the requirements of an area source MACT/GACT rule that the Ohio EPA does not have the delegated authority to implement. On January 9, 2008, U.S. EPA promulgated the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR Part 63, Subpart HHHHHH. Spray applications using coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd) and paint stripping operations using methylene chloride must be operated in compliance with this federal rule.

   Although Ohio EPA has determined that an area source MACT (also known as the GACT) may apply, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised that all requirements associated with these rules are in effect and are enforceable by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: http://www.epa.gov/ttn/atw/area/arearules.html

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group -Spray Booths w/Natural Gas Ovens: R014, R015, R016

EU ID	Operations, Property and/or Equipment Description
R014	Primer spray booth with a 0.4 MMBtu/hr natural gas-fired oven
R015	Top coat spray booth 1 with a 1.0 MMBtu/hr natural gas-fired oven
R016	Top coat spray booth 2 with a 1.0 MMBtu/hr natural gas-fired oven

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)g. and d)(8).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	VOC content shall not exceed 3.5 pounds per gallon of coating, as daily volume-weighted averages, excluding water and exempt solvents, for each individual emissions unit. See b)(2)a.
b.	OAC rule 3745-17-07(A)(1)(a)	Visible particulate emissions from the drying oven stacks serving these emissions units shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
b.	OAC rule 3745-17-10(B)	The particulate emissions (PE) from each of the natural gas fired dryers shall not exceed 0.020 pound per million Btu of actual heat input.
c.	OAC rule 3745-17-11(C)	See c)(2), c)(3) and d)(1) – d)(5).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-21-09(U)(1)(d)	The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to ORC 3704.03(T). See b)(2)a.
f.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid PSD)	For R014, VOC content shall not exceed 2.3 pounds per gallon of coating, as a daily volume-weighted average, excluding water and exempt solvents. This emission limitation is more stringent than the emission limitation established pursuant to ORC 3704.03(T). See b)(2)a., b)(2)b., b(2)c., d)(7) and e)(3).
g.	ORC 3704.03(F)(4) and OAC rule 3745-114-01	See d)(8).

(2) Additional Terms and Conditions

a. The volatile organic compound (VOC) content for coating metal and non-metal parts or products (e.g. fiberglass and plastic) shall not exceed the limits, in pounds per gallon of coating, as a daily volume-weighted average, excluding water and exempt solvents as noted in the following table:

Maximum allowable:

EU ID	Metal Substrates	Nonmetal Substrates
R014	2.3	2.3
R015	3.5	3.5
R016	3.5	3.5

b. The emissions of VOC from the coating and cleanup operations from the specified emissions units shall not exceed the limits, in tons/year, based upon a rolling, 12-month summation of the monthly emissions from the coating operations as noted in the following table:

Maximum allowable:

EU ID	VOC Emissions, Tons
R014	14.66
R015	29.53
R016	17.72

c. The maximum annual coating usage for these specified emissions units shall not exceed the limits, in gallons, based upon a rolling, 12-month summation of the coating usage figures as noted in the following table:

Maximum allowable:

EU ID	Coating Usage, Gallons
R014	12,750
R015	16,875
R016	10,125

c) Operational Restrictions

(1) To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

	R014 Maximum Allowable Cumulative Coating Usage (Gallons)	R015 Maximum Allowable Cumulative Coating Usage (Gallons)	R016 Maximum Allowable Cumulative Coating Usage (Gallons)
1	1,062	1,406	843
2	2,125	2,812	1,687
3	3,187	4,218	2,531

4	4,250	5,625	3,375
5	5,312	7,031	4,218
6	6,375	8,437	5,062
7	7,437	9,843	5,906
8	8,500	11,250	6,750
9	9,562	12,656	7,593
10	10,625	14,062	8,437
11	11,687	15,468	9,281
12	12,750	16,875	10,125

(2) The permittee shall operate the dry filtration system for the control of particulate emissions whenever any of these emissions units are in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

(3) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device(s) shall be expeditiously repaired or otherwise returned to these documented operating conditions.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filters, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA Northeast District Office upon request.

(2) The permittee shall conduct periodic inspections of the dry particulate filters to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

(3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filters while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

(4) The permittee shall document each inspection (periodic and annual) of the dry particulate filter systems and shall maintain the following information:

a. the date of the inspection;

b. the location (emissions unit id. no.) of the emissions;

c. a description of each/any problem identified and the date it was corrected;

d. a description of any maintenance and repairs performed; and

e. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the Ohio EPA Northeast District Office upon request.

(5) The permittee shall maintain records that document any time periods when the dry particulate filter(s) was/were not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer’s recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

(6) The permittee shall collect and record the following information each day for each of the coating lines:

a. the name and identification number of each coating and each cleanup material, as applied;

b. the organic compound (OC) content of each cleanup material employed, in pounds per gallon, excluding water;

c. the type of substrate (metal or nonmetal) that each coating is applied to;

d. the mass of VOC per volume of each coating and each cleanup material, excluding water and exempt solvents, as applied;

e. the net volume of each coating and each cleanup material, excluding water and exempt solvents, as applied;

f. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in OAC rule 3745-21-10(B)(9) for $C_{VOC,2}$ for metal substrates; and

g. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in OAC rule 3745-21-10(B)(9) for $C_{VOC,2}$ for nonmetal substrates.

(7) The permittee shall maintain monthly records of the following information for each emissions unit:

a. the VOC emission rate from all coatings and cleanup materials employed for each month of operations, in tons;

b. the rolling, 12-month summation of the VOC emissions;

c. the OC emission rate from all coatings and cleanup materials employed for each month of operations, in tons;

d. the coating usage for each month, in gallons; and

e. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of the permit, the rolling, 12-month summation of the coating usage, in gallons.

These monthly records shall also be maintained for the purpose of determining the annual emissions for each of the emissions units.

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative coating usage for each calendar month.

(8) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit-to-install (PTI) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation specified in b)(2)a. whenever metal parts and products are coated in any of these emission units. Each report shall be submitted within 45 days after the exceedance occurs.

(2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(3) The permittee shall submit quarterly deviation (excursion) reports that identify for these emission units:

a. the emissions unit id. no. where the deviation occurred;

b. an identification of each day when a daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation;

c. an identification of each day when a daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation specified in b)(2)a. whenever metal and nonmetal parts and products are coated;

d. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. the emissions unit id. no. where the deviation occurred;

ii. all exceedances of the rolling, 12-month emission limitation for VOC; and

iii. all exceedances of the rolling, 12-month limitation on coating usage; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels;

e. the probable cause of each deviation (excursion);

f. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

g. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the Northeast District Office).

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible PE from each of the drying oven stacks serving these emissions units shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emission limitation shall be demonstrated through visible emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

b. Emission Limitation:

The PE from each of the natural gas fired dryers shall not exceed 0.020 pound per million Btu of actual heat input.

Applicable Compliance Method:

Compliance may be based on the following estimation method:

PE(lb/mmBtu) = EF/(Btu/cf)

where:

PE(lb/mmBtu) = the PE rate, which is estimated to be 0.0072 pound of PE-PM_{10} per million Btu actual heat input;

EF = emission factor, which is 7.6 lb PE-PE_{10} per million cubic foot of natural gas fuel flow per AP42 Table 1.4-2. Chap. 1.4 (July, 1998); and

Btu/cf = factor to convert heat input to cubic foot of natural gas fuel flow, which is 1050 Btu/cf as specified in the application for PTI P0120249.

c. Emission Limitations:

The volatile organic compound (VOC) content for coating metal and non-metal parts or products (e.g. fiberglass and plastic) shall not exceed the limits, in pounds per gallon of coating, as a daily volume-weighted average, excluding water and exempt solvents as noted in the following table:

Maximum allowable:

EU ID	Metal Substrates	Nonmetal Substrates
R014	2.3	2.3
R015	3.5	3.5
R016	3.5	3.5

Applicable Compliance Method:

Compliance shall be based on the following estimation method(s):

$$\left(C_{VOC,2}\right)_A = \frac{\sum_{i=1}^{n}\left[(C_{VOC,2i}L_{Ci})\,(V_{Si}+V_{VOCi})\right.}{\sum_{i=1}^{n}L_{Ci}(V_{Si}+V_{VOCi})}$$

where:

$(C_{VOC,2})_A$ = the daily volume-weighted average VOC content of all coatings, as applied, as specified in OAC rule 3745-21-10(B)(9);

$C_{VOC,2}$ = the VOC content in pounds of VOC per gallon of coating, excluding water and exempt solvents calculated as follows:

$C_{VOC,2} = (D_C)(W_{VOC})/(V_S + V_{VOC})$;

D_C = the density of a coating, in pounds of coating per gallon of coating;

W_{VOC} = the weight fraction of VOC in a coating = $W_{VM} - W_W - W_{ES}$;

W_{VM} = the weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating;

W_W = the weight fraction of water in coating, in pound of water per pound of coating;

W_{ES} = the weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating;

V_S = the volume fraction of solids in coating, in gallons of solids per gallon of coating;

V_{VOC} = the volume fraction of VOC in a coating. = $V_{VM} - V_W - V_{ES}$;

V_{VM} = the volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating;

V_W = the volume fraction of water in coating, in gallon of water per gallon of coating;

V_{ES} = the volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating;

A = a subscript denoting that the indicated VOC content is a weighted average of the coatings employed during time period t;

L_C = the liquid volume of coating employed during time period t, in gallons of coating;

i = a subscript denoting a specific coating employed during time period t;

n = the total number of coatings employed during time period t; and

t = the time period specified for the weighted average VOC content is per day and not included in the calculation.

For an alternative compliance method request, the permittee shall submit a written request and receive approval from Ohio EPA before an alternative method, not listed above, may be used for the VOC content determination.

d. Emission Limitation:

The emissions of VOC from the coating and cleanup operations from the specified emissions units shall not exceed the limits, in tons/year, based upon a rolling, 12-month summation of the monthly emissions from the coating operations as noted in the following table:

Maximum allowable:

EU ID	VOC Emissions, Tons
R014	14.66
R015	29.53
R016	17.72

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in d)(7) for these emissions units.

e. Emission Limitation:

The maximum annual coating usage for these specified emissions units shall not exceed the limits, in gallons, based upon a rolling, 12-month summation of the coating usage figures as noted in the following table:

Maximum allowable:

EU ID	Coating Usage, Gallons
R014	12,750
R015	16,875
R016	10,125

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in d)(7) for these emissions units.

g) Miscellaneous Requirements

(1) In accordance with OAC rule 3745-21-07(M)(3)(a), OAC rule 3745-21-07(M)(2) is not applicable because these emissions units are not equipped with control equipment for VOC emissions.

(2) These emissions units will not coat wood furniture and therefore it is not subject to the requirements of OAC rule 3745-21-15 nor to the requirements of 40 CFR Part 63, Subpart JJ - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Wood Furniture Manufacturing Operations (40 CFR 63.800-63.808 and associated tables).

(3) The emissions units at this facility are located in Holmes County and not in any county identified in OAC rule 3745-21-24(A)(1) and is therefore not subject to the requirements of OAC rule 3745-21-24 for coating of flat wood paneling.

(4) The Provia Walnut Creek Facility is an area (minor) source of hazardous air pollutant (HAP) emissions. This source is not subject to the NESHAPfor the Surface Coating of Wood Building Products (40 CFR 63.4680 – 63.4781 and associated tables).